

In the County of Yarmouth, Nova Scotia, Canada

**Affidavit of Charles L. Leary Sworn on September 4, 2013**

BEFORE ME, personally came and appeared Charles L. Leary, a person of the full age of majority and domiciled in Kemptville, Yarmouth County, Nova Scotia, who, after being duly sworn, did depose and say:

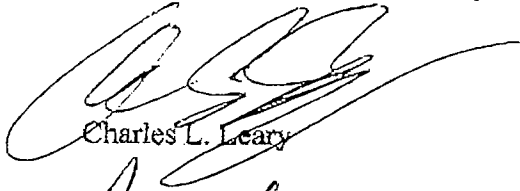
1. I have an action pending against Douglas Handshoe in Nova Scotia Supreme Court for causes of action including 4 instances of copyright infringement and multiple instances of defamation.
2. Mr. Handshoe has included this Nova Scotia proceeding in his lawsuit claims filed in Mississippi. I believe he has stated that this action is an abuse of process in tort, part of a conspiracy, and that he is seeking damages and well as equitable relief from the Mississippi court with regard to this Nova Scotia proceeding.
3. In Nova Scotia, I have pleaded the defamation claims to a standard I believe acceptable under Mississippi law, which give Mr. Handshoe complete notice as to the falsity of his allegations as well as particularity as to the words alleged to be defamatory.
4. I am familiar with the Nova Scotia Civil Procedure Rules.
5. When filing a Notice of Action in Nova Scotia, one must state if the action is valued at over \$100,000.00 (with simplified discovery procedures) or over \$100,000.00.
6. In my Notice of Action, the value of the action is stated to be over \$100,000.
7. I have personal knowledge of the fact that Mr. Handshoe is aware of the value of my claims, as he is actively engaged in court process in Nova Scotia.
8. For instances of copyright infringement under the Canada Copyright Act, statutory damages are allowed up to a value of \$20,000 for each instance of infringement.
9. I alleged 4 instances of copyright infringement involving 4 creative works, for a total possible value of \$80,000 in addition to the claims for defamation.
10. In Nova Scotia, punitive and aggravated damages may be awarded for both copyright infringement and defamation.
11. I have personal knowledge that Mr. Handshoe claimed his attorney's fees in the SPEECH Act proceeding he removed to the U.S. Federal District Court for the Southern District of Mississippi in 2012 was a purported \$60,000.
12. I believe Mr. Handshoe's lawsuit refers to that proceeding as being part of a malicious prosecution, an abuse of process, and part of a conspiracy.
13. I have a Nova Scotia Supreme Court judgement against Mr. Handshoe for \$427,000. *or malicious prosecution*
14. This judgement and its related court proceeding(s) is alleged by Mr Handshoe to be an abuse of process in tort and part of a conspiracy. I believe Mr. Handshoe is seeking damages as well as equitable relief related to this judgement.

EXHIBIT

"A"

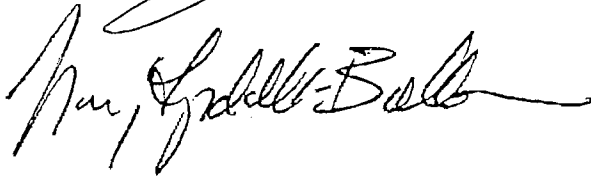
Further the affiant sayeth not.

Sworn to before me this 4<sup>th</sup> day of September, 2013



Charles L. Leary

Commissioner of Oaths



NANCY TYNDALL-BULLERWELL  
Commissioner of The Supreme  
Court of Nova Scotia